

GDP-0445

**RISK MANAGEMENT PLAN (40CFR68)**  
applicability to the  
**K-1515 WATER TREATMENT PLANT**

**THRESHOLD:** The 40CFR68.130 threshold for chlorine is 2500 pounds. Current process configuration consists of two 1-ton containers with one serving as a ready spare. The current configuration of 4000 pounds plus pipe capacity meets the regulatory requirements for risk management planning under the EPA Risk Management Plan (RMP) Rule. Compliance is required by June 22, 1999, and compliance planning would need to begin much sooner.

**THRESHOLD CONTROL OPTIONS:** Administrative controls to limit the amount of chemical in a process are allowed, and they will be considered in the early stages of planning for compliance. For clarity, however, a risk management planning schedule will be followed unless/until replaced by satisfactory administrative control plans, which would require revised process safety documentation. In addition, risk management planning could be curtailed by definitive plans to turn water plant operations over to the City prior to June 22, 1999.

**RISK MANAGEMENT PLAN REQUIREMENTS.** A generic compliance plan on the next page identifies the components required to satisfy the 40CFR68 RMP Rule. It is important to note that existing process safety documentation will initially satisfy the Accident Prevention Program requirements, with review and only minor change, i.e., the greatest time/cost consuming parts of the RMP are done. Some additional requirements have been accomplished as part of the applicability review, leaving RMP documentation and formal demonstration of compliance with administrative details of 40CFR68, i.e., common EMD EPA regulatory compliance activities, with the possible exception of a comprehensive executive summary.

**IMPLICATIONS.** Approximately three manmonths of Risk Management Program documentation and compliance preparation over the next one to two years, but well within the technical capabilities of current operations, safety and environmental personnel.

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## 40CFR68 COMPLIANCE PLAN

## Phase I. Preliminaries

## -- Program-level determination:

- 68.10(b)1 Accidental release(s) offsite?
- 68.10(b)2 Worst-case distance to endpoint?
- 68.10(b)3 Process-specific local response plan?
- 68.12(b) Program 1 process? [If yes, go to III below.]
- 68.12(c) Program 2 process?
- 68.12(d) Program 3 process?

## -- Threshold Control Options (40CFR68.115)

## -- Program Management Structure (40CFR68.15)

## Phase II. Development of Risk Management Plan Components

## -- Hazard assessments (40CFR68.22-42)

Worst-case scenario & Alternate worst-case scenario.  
Offsite impact to population and environment.

## -- Accident Prevention Program

- 68.65 Process Safety Rqmts Review
- 68.67 Process Hazard Analysis Review
- 68.69 S.O.P. Review
- 68.71 Training Requirements Review
- 68.73 Preventive Maintenance Review
- 68.75-87 (Additional Pgm 3 requirements)

## -- Emergency Response Plan (40CFR68.95)

## Phase III. Risk Management Plan Administrative Compliance

- RMP consolidation and internal compliance audit
- Preparation of Executive Summary (40CFR68.155)
- Facility Registration (40CFR68.160)
- RMP certification and Submittal (40CFR68.150 & 185)